

# **EXHIBIT “1”**

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC. )  
v. Plaintiff ) Case No. PJM 08 cv 0921  
v. )  
WORLD AVENUE USA, LLC, et al. )  
Defendants )  
\_\_\_\_\_  
)

**DECLARATION OF SANFORD M. SAUNDERS, JR.**

I, SANFORD M. SAUNDERS, JR., being of full age, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

1. I am a shareholder in the international law firm Greenberg Traurig, P.A. (Greenberg Traurig”), and am the co-managing shareholder of the firm’s Washington, D.C. office. I am the lead counsel representing World Avenue USA, LLC (“WAUSA”) in the above captioned matter and submit this Declaration in support of Defendant WAUSA’s Application As to Amount of Attorneys’ Fees (“Application”).

2. I am familiar with the hourly rates charged by each of the personnel involved in this case. Through my more than twenty-five (25) years of litigation practice, I am also familiar with the customary hourly rates charged by attorneys of similar experience in the District of Maryland as well as in the surrounding District of Columbia metropolitan area.

3. The hourly rates charged in this case are the customary hourly rates charged to clients for services rendered by the personnel involved.

4. Moreover, the hourly rates charged in this case are within the range of hourly rates charged by attorneys with similar skill and experience in this jurisdiction. For example,

pursuant to a National Law Journal article indicates that the law firm of Steptoe & Johnson's rates are above those we are charging in this matter. Steptoe's rates are relevant since they represent BSI in parallel litigation pending before this court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: October 28, 2010



SANFORD M. SAUNDERS, JR.